



U.S. Department of Justice

United States District Court
Southern District of New York86 Chambers Street
New York, New York 10007-1312

February 5, 2025

USDC SDNY

DOCUMENT

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DATE FILED: 2/6/2025

VIA ECF

Hon. Analisa Torres
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007-1312

Re: *Ideanomics Inc. and Matthew Fogel v. U.S. Citizenship and Immigration Services, No. 23 Civ. 10698 (AT)*

Dear Judge Torres:

This Office represents the government in this action, in which plaintiffs seek judicial review under the Administrative Procedure Act (“APA”) of a decision by U.S. Citizenship and Immigration Services (“USCIS”) denying a Form I-140, Immigrant Petition for Alien Worker, that plaintiff Ideanomics Inc. filed on behalf of plaintiff Matthew Fogel. Last night, February 4, 2025, the undersigned attempted to timely file the government’s reply in support of its motion for summary judgment and its opposition to plaintiffs’ cross-motion for summary judgment. The undersigned had technological difficulties saving the brief in Microsoft Word and then in Adobe Acrobat for several minutes right before midnight. Ultimately the undersigned filed the brief at 12:06 AM today, on February 5. I apologize for this delay and respectfully request that the Court deem this brief, filed six minutes after the deadline, timely filed. Plaintiffs consent this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

DANIELLE R. SASSOON
United States Attorney

GRANTED.

SO ORDERED.

Dated: February 6, 2025
New York, New York

ANALISA TORRES
United States District Judge

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